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RICHARD W. WIEKING  
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NORTHERN DISTRICT OF CALIFORNIA

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1 KARL J. KRAMER (No. 136433)  
JANA G. GOLD (No. 154246)  
2 MORRISON & FOERSTER LLP  
755 Page Mill Road  
3 Palo Alto, California 94304-1018  
Telephone: (415)813-5600

4  
5 RAOUL D. KENNEDY (No. 40892)  
MORRISON & FOERSTER LLP  
345 California Street  
6 San Francisco, California 94104-2675  
Telephone: (415) 677-7000

7  
8 PATRICK J. FLINN (No. 104423)  
ALSTON & BIRD  
One Atlantic Center  
9 1201 W. Peachtree Street  
Atlanta, Georgia 30306  
10 Telephone: (404)881-7000

11 Attorneys for Defendants/Counter-  
Claimants CYLINK, CARO-KANN CORPORATION  
12 AND THE BOARD OF TRUSTEES OF THE  
LELAND STANFORD JUNIOR UNIVERSITY  
13

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

16 ROGER SCHLAFLY,

17 Plaintiff,

18 v.

19 PUBLIC KEY PARTNERS AND RSA DATA  
20 SECURITY, INC.,

21 Defendants,

22 RSA DATA SECURITY, INC.,

23 Plaintiff,

24 v.

25 CYLINK CORPORATION and CARO-KANN  
26 CORPORATION, et al.

27 Defendants.

No. C-94-20512 SW

No. C-96-20094 SW

STIPULATED ORDER REGARDING  
EXPERTS AND DOCUMENTARY  
EVIDENCE

cc-  
STIPULATED ORDER REGARDING EXPERTS  
AND DOCUMENTARY EVIDENCE

No. C-96-20094 SW

1 WHEREAS the parties have agreed to revise the pre-trial  
2 schedule concerning expert reports and depositions and foundational  
3 discovery regarding the authenticity and admissibility of materials;

4 WHEREAS the parties agreement herein is not made for the  
5 purpose of delay;

6 THEREFORE THE PARTIES AGREE AS FOLLOWS:

7 1. Expert Reports.

8 a. Reports offered on behalf of a party with the burden  
9 of proof on an issue shall be served on November 22, 1996.

10 b. Rebuttal expert reports shall be served on December  
11 6, 1996.

12 2. Expert Depositions. Expert depositions shall take place  
13 during the period December 9, through December 20, 1996.

14 3. Custodian of Records Depositions. The parties shall meet  
15 and confer regarding the foundational and admissibility issues  
16 relating to documents. Should they fail to reach agreement  
17 regarding specific documents, the parties may take 30(b)(6)  
18 depositions during January 1997 to obtain evidence concerning such  
19 issues.

20 STIPULATED AND AGREED:

21 Dated: October 24, 1996

22 MORRISON & FOERSTER LLP  
23 ALSTON & BIRD

24 By: 

25 Karl J. Kramer

26 Attorneys for Defendants and Counter-  
27 Claimants Cylink Corporation, Caro-  
28 Kann Corporation, and The Board of  
Trustees of the Leland Stanford Junior  
University

1  
2 Dated:

10/24/96

HELLER, EHRMAN, WHITE & MCAULIFFE

4  
5 By:

Robert T. Heller

Attorneys for Plaintiff RSA

6  
7 Dated:

Oct 25, 1996

8  
9 ROGER SCHLAFLY

R. Schlafly

10  
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12 IT IS SO ORDERED.

13  
14 Dated:

30 Oct 1996

Spencer Williams

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16 UNITED STATES DISTRICT COURT JUDGE  
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